

## REMARKS

In response to the Office Action dated March 15, 2006, Applicant has canceled claims 1-45 and added new claims 46-63. Claims 46-63 are pending in the case. Applicant respectfully requests reconsideration and reexamination of the application in view of the amendments.

In paragraph 3 on page 2 of the Office Action, claims 1, 4, 5, 6, 7, 8, 11, 11, 17, 20, 21, 22, 23, 37, 39, 40, 41, and 42 were rejected under 35 U.S.C. § 103(a) over Notredame et al. (U.S. Patent No. 6,049,390) in view of Powel III (U.S. Patent No. 6,292,194).

In paragraph 3 on page 5 of the Office Action, claims 2 and 18 were rejected under 35 U.S.C. § 103(a) over Notredame and Powell III in further view of Maertens (U.S. Patent No. 6,526,214).

In paragraph 4 on page 6 of the Office Action, claims 3, 19 and 38 were rejected under 35 U.S.C. § 103(a) over Notredame, Powell III and Maertens in further view of Suzuki et al. (U.S. Patent No. 6,298,164).

In paragraph 5 on page 7 of the Office Action, claims 9 and 24 were rejected under 35 U.S.C. § 103(a) over Notredame and Powell III in further view of Takahashi et al. (U.S. Patent No. 6,078,694).

In paragraph 6 on page 9 of the Office Action, claims 12, 13, 15, 16, 26, 27, 29, 30, 44, and 45 were rejected under 35 U.S.C. § 103(a) over Notredame and Powell III in view of Houle (U.S. Patent No. 5,710,719).

In paragraph 7 on page 11 of the Office Action, claims 14 and 28 were rejected under 35 U.S.C. § 103(a) over Notredame, Powell III and Houle in further view of Rumph et al. (U.S. Patent No. 6,049,390).

Applicant respectfully traverses the rejections, but in the interest of expediting prosecution have amended the claims to overcome the rejection.

Notredame discloses merging mask data for all page elements that include CT data to form a merged CT selection mask, merging compressed line work data of all the page elements that include line work data to form compressed merged line work data and merging compressed CT data of all the page elements that include CT data to form compressed merged CT data. The CT selection mask identifying each pixel in the page element as a line work pixel or a CT pixel and is used to decide whether an output pixel has to come from the LW data or CT data. The merging of mask data, compressed line work data and compressed CT data occurs substantially in the compressed image domain. Accordingly, no decompression takes place until the image is to be printed.

Notredame fails to disclose, teach or suggest defining a target item having a target area, the target area being defined by a boundary that extends from a leftmost pixel of a leftmost display item of the plurality of compressed display items to a rightmost pixel of a rightmost display item of the plurality of compressed display items. Rather, according to Notredame, the merging takes place page element by page element. Notredame states at column 18, that a computer program comprises three thread, i.e., a read thread, a merge thread and an output thread, wherein the merge thread 1109 simply merges the line work, CT selection mask and CT data, color separation by separation, and writes the result into

the page buffer(s) 1111” Thus, merged items for a page element in Notredame are thus merely written into page buffer 1111.

Accordingly, Notredame fails to disclose, teach or suggest defining a target item having a target area as defined in the independent claims.

Notredame fails to disclose, teach or suggest assigning each of the plurality of decompressed display items a priority. Rather, Notredame merely describes assigning a page element a knockout value that indicates that the page element knocks out all page elements underneath at that location. While assigning a page element a knockout indicator involves setting that particular page element as a top priority, such a process does not involve assigned each of the plurality of decompressed display items a priority.

Accordingly, Notredame fails to disclose, teach or suggest defining a target item having a target area as defined in the independent claims.

Because Notredame fails to disclose, teach or suggest defining a target item having a target area as defined in the independent claims, Notredame cannot be said to disclose, teach or suggest examining the decompressed display items based on the assigned item priority.

Notredame fails to disclose, teach or suggest aligning each of the decompressed display items relative to the n pixel boundaries within the target area. In fact, the Office admits that Notredame fails to disclose, teach or suggest aligning each of the decompressed display items relative to the n pixel boundaries within the target area.

Notredame fails to disclose, teach or suggest merging the decompressed display items in the target area to produce the final merged output for an imaging system according to item priority and pixel control data to produce the target item, the target item

representative of the merged plurality of display items. Rather, Notredame teaches away from merging the decompressed display items because Notredame discloses that the merging occurs substantially in a compressed domain so that substantially no decompression takes place.

Notredame fails to disclose, teach or suggest re-compressing the merged display items to produce the final merged output for an imaging system. As described above, Notredame discloses that the merging occurs substantially in a compressed domain so that substantially no decompression takes place. Thus, Notredame fails to disclose, teach or suggest re-compressing the merged display items to produce the final merged output for an imaging system.

Powell III fails to overcome the deficiencies of Notredame. Powell III is cited as disclosing the use of a target area. However, Powell III fails to disclose, teach or suggest defining a target item having a target area, the target area being defined by a boundary that extends from a leftmost pixel of a leftmost display item of the plurality of compressed display items to a rightmost pixel of a rightmost display item of the plurality of compressed display items. Rather, Powell III merely discloses the use of generalized sprites (gsprites), wherein, as more particularly explained in Fig. 16B, a "coffee-cup" is sub-divided into a number of smaller objects (e.g. cup container, cup handle, saucer, and fumes) and create smaller individual gsprites rather than a large gsprite as shown in Fig. 16A. Each of these sub-objects would be enclosed by bounding boxes.

However, the sub-objects enclosed by bounding boxes do not define a target area defined by a boundary that extends from a leftmost pixel of a leftmost display item of the plurality of compressed display items to a rightmost pixel of a rightmost display item of

the plurality of compressed display items. In fact, the sub-objects in Powell III represent all of the data for pixels of the image within a bounding box and therefore fails to suggest the use of a target area for display items comprising compressed rasterized line work, contone objects that are to be combine to produce a final merged output for an imaging system.

Maertens, Suzuki, Takahashi, Houle, and Rumph, alone or in combination fails to remedy the deficiencies of Notredame and Powell III.. Maertens merely discloses a method and apparatus for decoding and displaying a DVD sub-picture. Suzuki et al. merely disclose converting a compressed JETSEND image into a compressed PCL raster image. Takahashi et al. merely teach an image signal padding method and coding and decoding apparatus. Houle merely teaches compressing image data into a compressed form and for decompressing the compressed form. Rumph et al. merely teach a method for converting a page image defined using a PDL into print data and printer control commands. The above-mentioned references however, do not mention Applicant's "defining target items having a target area," or Applicant's "merging the display items in the target area according to item priority to produce the target item, the target item representative of the merged plurality of display items."

Because the Office Action fails to cite a reference or references that teach, disclose, or suggest all of the elements of at least the independent claims, Applicant submits that the rejections are improper and request they be withdrawn.

10, 25, 31-36 and 43

Dependent claims 47-51, 53-57 and 59-63 are also patentable over the references, because they incorporate all of the limitations of the corresponding independent claims

46, 52, and 58. Further, dependent claims 47-51, 53-57 and 59-63 recite additional novel elements and limitations. Applicant reserves the right to argue independently the patentability of these additional novel aspects. Therefore, Applicant respectfully submits that dependent claims 47-51, 53-57 and 59-63 are patentable over the cited patent.

On the basis of the above amendments and remarks, it is respectfully submitted that the claims are in immediate condition for allowance. Accordingly, reconsideration of this application and its allowance are requested.

If a telephone conference would be helpful in resolving any issues concerning this communication, please contact Attorney for Applicant, David W. Lynch, at 423-757-0264.

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Respectfully

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